



# Correspondence Management System

Control Number: AX-14-001-5526

Printing Date: September 29, 2014 10:42:25



## Citizen Information

**Citizen/Originator:** Norton, Dean E.

Organization: New York Farm Bureau Inc.

Address: 159 Wolf Road, Post Office Box 5330, Albany, NY 12205-0330

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-14-001-5526 **Alternate Number:** 9205 5901 0141 1600 0026 13  
**Status:** For Your Information **Closed Date:** N/A  
**Due Date:** N/A **# of Extensions:** 0  
**Letter Date:** Sep 19, 2014 **Received Date:** Sep 24, 2014  
**Addressee:** AD-Administrator **Addressee Org:** EPA  
**Contact Type:** LTR (Letter) **Priority Code:** Normal  
**Signature:** SNR-Signature Not Required **Signature Date:** N/A  
**File Code:** 401\_127\_a General Correspondence Files Record copy  
**Subject:** DRF - Daily Reading File - Municipal resolutions that have been passed asking for the withdrawal of the proposed changes to the definition of the Waters of the U.S. under the Clean Water Act; Docket No. EPA-HQ-OW-2011-0880  
**Instructions:** For Your Information -- No action required  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** Ellen Tarquinio - AO-IO  
OCIR - Office of Congressional and Intergovernmental Relations  
OEAAE - Office of External Affairs and Environmental Education  
R2 - Region 2 -- Immediate Office

## Lead Information

**Lead Author:** N/A

**Lead Assignments:**

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
No Record Found.					

## Supporting Information

**Supporting Author:** N/A

**Supporting Assignments:**

Assigner	Office	Assignee	Assigned Date
Jacqueline Leavy	OEX	OW	Sep 29, 2014

## History

Action By	Office	Action	Date
Jacqueline Leavy	OEX	Forward control to OW	Sep 29, 2014



New York Farm Bureau, Inc. • 159 Wolf Road, P.O. Box 5330 • Albany, New York 12205-0330 • (518) 436-8495 Fax: (518) 431-5656 • www.nyfb.org

September 19, 2014

Gina McCarthy  
U.S. Environmental Protection Agency  
Office of the Administrator, 1101A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

John McHugh  
Secretary of the U.S. Army  
101 Army Pentagon  
Washington, DC 20310-0101

REC'D  
2014 SEP 24 PM 1:39  
OFFICE OF THE  
EXECUTIVE SECRETARY

Dear Administrator McCarthy and Secretary McHugh,

On behalf of the concerned members of New York Farm Bureau (NYFB) and the many communities that are vital to our farmers, I would like to share with you a number of municipal resolutions that have been passed in our state asking for the withdrawal of the proposed changes to the definition of the Waters of the U.S. under the Clean Water Act (Docket No. EPA-HQ-OW-2011-0880).

Enclosed you will find resolutions from **35 county governments**, representing well over half of the counties in New York. There are also resolutions from **17 towns** and several other organizations, all opposing the regulation as proposed. Our municipalities are already doing so much with the limited resources they have and we believe unwarranted additional costs and permitting burdens will further undermine our rural infrastructure and the viability of our communities.

Clean water is a priority of our farms and municipalities alike; we all use this water and the futures of our businesses and communities depend on safe, clean water. However, it is a general consensus that this regulation does not provide the clarity your agencies purport and is a broad overreach of the intent of the Clean Water Act. Here in New York, our state Department of Environmental Conservation provides a strong water quality program and works together with the state department of Agriculture and Markets and our farms to safeguard and constantly improve the water resources of our state.

The National Association of Counties, and recently, the National Association of State Departments of Agriculture (NASDA), have also called for the EPA and the Corps to withdraw this rule. NYFB, the largest general agricultural organization in the state, stands by these organizations and the municipalities represented in this packed by asking for EPA and the Corps to pull back this proposal.

Should you have any questions, feel free to contact our office or the municipalities directly.

Sincerely,

Dean E. Norton  
President

Cc: New York Congressional Delegation  
New York State Governor Andrew Cuomo  
Commissioner Joe Martens, New York State Department of Environmental Conservation  
Commissioner Richard Ball, New York State Department of Agriculture and Markets  
EPA Region 2 Administrator Judith Enck



New York Farm Bureau • 159 Wolf Road P.O. Box 5330 • Albany, New York 12205 • (518) 436-8495 Fax: (518) 431-5656

## New York Municipal Resolutions opposing the Clean Water Act Proposed Rule by the Environmental Protection Agency and Army Corps of Engineers (as of September 18, 2014):

- Allegany County Board of Legislators
- Cattaraugus County Legislature
- Broome County Legislature
- Chemung County Legislature
- Chenango County Board of Supervisors
- Clinton County Legislature
- Cortland County Legislature
- Delaware County Board of Supervisors
- Essex County Board of Supervisors
- Franklin County Legislature
- Fulton County Board of Supervisors
- Genesee County Legislature
- Greene County Legislature
- Herkimer County Legislature
- Jefferson County Board of Legislators
- Lewis County Board of Legislators
- Livingston County Board of Supervisors
- Madison County Board of Supervisors
- Monroe County Legislature
- Niagara County Legislature
- Oneida County Board of Legislators
- Ontario County Board of Supervisors
- Orange County Legislature
- Orleans County Legislature
- Oswego County Legislature
- Rensselaer County Legislature
- Saint Lawrence County Board of Legislators
- Schoharie County Board of Supervisors
- Schuyler County Legislature
- Sullivan County Legislature
- Tioga County Legislature
- Washington County Board of Supervisors
- Wayne County Board of Supervisors
- Wyoming County Board of Supervisors
- Yates County Legislature

- Town of Ira (Cayuga County)
  - Town of Van Etten (Chemung County)
  - Town of Livingston (Columbia County)
  - Town of Colchester (Delaware County)
  - Town of Deposit (Delaware County)
  - Town of Kortright (Delaware County)
  - Town of Masonville (Delaware County)
  - Town of Stamford (Delaware County)
  - Town of Walton (Delaware County)
  - Town of Denmark (Lewis County)
  - Town of Richmond (Ontario County)
  - Town of Delaware (Sullivan County)
  - Town of Neversink (Sullivan County)
  - Town of Thompson (Sullivan County)
  - Town of Butler (Wayne County)
  - Town of Ontario (Wayne County)
  - Town of Walworth (Wayne County)
- 
- Chemung County Soil & Water Conservation District
  - Chemung County Stormwater Coalition
  - Chemung County Water Quality Committee



# Correspondence Management System

Control Number: AX-14-001-5592

Printing Date: September 29, 2014 12:48:17



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## Citizen Information

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**Citizen/Originator: Fenwick, George H.**

Organization: American Bird Conservancy  
Address: P.O. Box 249, 4249 Loudoun Avenue, The Plains, VA 20198-2237

**Feldman, Jay**

Organization: Beyond Pesticides  
Address: 701 E Street, S.E, Washington, DC 20003

**Evans, Jonathan**

Organization: Center for Biological Diversity  
Address: 351 California Street, San Francisco, CA 94104

**Green, Michael**

Organization: Center for Environmental Health  
Address: 2201 Broadway, Oakland, CA 94612

**Kimbrell, Andrew**

Organization: The Center for Food Safety  
Address: 660 Pennsylvania Avenue, SE, Washington, DC 20003

**Hauter, Wenonah**

Organization: Food & Water Watch  
Address: 1616 P Street, NW, Washington, DC 20036

**Pica, Erich**

Organization: Friends of the Earth  
Address: 1100 15th N.W. 11th Floor, Washington, D.C. 20005

**Leval, Kim**

Organization: Northwest Center for Alternatives to Pesticides  
Address: Post Office Box 1393, Eugene, OR 97440

**Cummins, Ronnie**

Organization: Organic Consumers Association & Via Organica  
Address: 6771 South Silver Hill Drive, Finland, MN 55603

**Arkin, Lisa**

Organization: Beyond Toxics  
Address: P.O. Box 1106, Eugene, OR 97440

**Hatcher, Judy**

Organization: Pesticide Action Network North America  
Address: 1611 Telegraph Avenue, Oakland, CA 94612

**Brune, Michael**

Organization: Sierra Club  
Address: 50 F Street, NW Eighth Floor, Washington, DC 20001

**McCarthy, Richard**

Organization: Slow Food USA  
Address: 68 Summit Street, Brooklyn, NY 11231

**Holcomb, Bridge**

Organization: Women, Food and Agriculture Network  
Address: PO Box 611, Ames, IA 50010



# Correspondence Management System

Control Number: AX-14-001-5592

Printing Date: September 29, 2014 12:48:17

**Peck, John**

Organization: Family Farm Defenders  
Address: P.O. Box 1772, Madison, WI 53701

**Berlin, Ruth**

Organization: Maryland Pesticide Network  
Address: 544 Epping Forest Road, Annapolis, MD 21401

**Jones, Faye**

Organization: Midwest Organic Sustainable Education Service  
Address: P.O. Box 339, Spring Valley, WI 54767

**Walker, Larissa**

Organization: Center for Food Safety  
Address: 660 Pennsylvania Avenue, SE, Washington, DC 20003

Constituent: N/A

Committee: N/A

Sub-Committee: N/A

**Control Information**

<b>Control Number:</b>	AX-14-001-5592	<b>Alternate Number:</b>	N/A
<b>Status:</b>	Pending	<b>Closed Date:</b>	N/A
<b>Due Date:</b>	Oct 14, 2014	<b># of Extensions:</b>	0
<b>Letter Date:</b>	Sep 24, 2014	<b>Received Date:</b>	Sep 25, 2014
<b>Addressee:</b>	AD-Administrator	<b>Addressee Org:</b>	EPA
<b>Contact Type:</b>	EML (E-Mail)	<b>Priority Code:</b>	Normal
<b>Signature:</b>	DX-Direct Reply	<b>Signature Date:</b>	N/A
<b>File Code:</b>	404-141-02-01_141_b Controlled and Major Corr. Record copy of the offices of Division Directors and other personnel.		
<b>Subject:</b>	DRF - Daily Reading File - Comment on assessment of neonicotinoid insecticides		
<b>Instructions:</b>	DX-Respond directly to this citizen's questions, statements, or concerns		
<b>Instruction Note:</b>	N/A		
<b>General Notes:</b>	N/A		
<b>CC:</b>	Kelley Smith - AO-IO OEAE - Office of External Affairs and Environmental Education		

**Lead Information**

Lead Author: N/A

**Lead Assignments:**

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Jacqueline Leavy	OEX	OCSPP	Sep 26, 2014	Oct 14, 2014	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					
Zelma Taylor	OCSPP	OCSPP-OPP	Sep 26, 2014	Oct 14, 2014	N/A
<b>Instruction:</b> direct reply--Respond directly to this citizen's questions, statements, or concerns					



September 24, 2014

The Honorable Gina McCarthy, Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building, MC 1101A  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

FEDERAL EXPRESS

**Re: Comment on EPA assessment of neonicotinoid insecticides**

Dear Administrator McCarthy,

On June 20, 2014, President Obama issued the White House Memorandum “Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators.” We strongly applaud the President for this critical initiative that recognizes the urgency of taking action on pollinator declines.

Sec. 3.1 of his Memorandum states (in pertinent part):

*.... the “Environmental Protection Agency shall assess the effects of pesticides, including neonicotinoids, on bee and other pollinator health and take action, as appropriate, to protect pollinators.” [within 180 days].*

The undersigned leaders of 17 major non-profit environmental and consumer groups respectfully request that you consider our comments during EPA’s assessment of the neonicotinoid insecticides.<sup>1</sup> Neonicotinoids have rapidly become one of the most widely used classes of agricultural chemicals. It is apparent that the White House is concerned that EPA’s current

<sup>1</sup> The active ingredients are: acetamiprid, clothianidin, dinotefuran, imidacloprid, thiacloprid and thiamethoxam.

Registration Review schedule under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is not timely. The agency's schedule calls for most of the neonicotinoids to be reviewed not until 2018-2019.<sup>2</sup>

To be clear, as the Memorandum recognizes, this issue is not just about domesticated honey bees, as crucial as they are to the food supply. It is about all native pollinators, taking in literally thousands of U.S. species, ranging from bumblebees, wasps, moths, butterflies, flies and beetles, to hummingbirds, perching birds, bats and several other mammals, such as possums. We urge EPA to sweep even more broadly in its assessment and consider the effects of neonicotinoids on beneficial species of all varieties, as well as considering basic ecosystem sustainability, upon which all species ultimately depend, including humans.

#### **A. - EPA's Assessment Should Evaluate the Effects and Exposure Routes that the Agency has Not Fully Considered in Past Risk Assessments**

It appears that the President seeks not only a forward-looking assessment of future risks of the neonicotinoids, but also an accounting of their past "effects". Unfortunately, the situation is grim. The effects of the neonicotinoids – which have increased in global use by orders of magnitude in the last 15 years - were recently reviewed by a large expert group chartered under the International Union for the Conservation of Nature, known as the Task Force on Systemic Pesticides (IUCN Task Force). It has assessed effects of systemic pesticides on biodiversity and ecosystems, with a focus on pollinators and other non-target species.

The IUCN Task Force reviewed approximately 800 peer-reviewed articles on the neonicotinoids, plus fipronil. Their report, entitled the "Worldwide Integrated Assessment on Systemic Pesticides," is being published serially in *Environmental Science and Pollution Research*. Key findings include:<sup>3</sup>

- Neonicotinoids are present in the environment "at levels that are known to cause lethal and sublethal effects on a wide range of terrestrial (including soil) and aquatic microorganisms, invertebrates and vertebrates."
- The active ingredients persist, particularly in soils, with half-lives of months and, in some cases, years, and they accumulate. This increases their toxicity by increasing the duration of exposure of non-target species.
- The metabolites of neonicotinoids are often as or more toxic than the active ingredients.
- Typical measurements used to assess the toxicity of a pesticide (short-term lab toxicity results) are not useful for systemic pesticides and conceal the true impacts. They measure direct acute effects rather than chronic effects via multiple routes of exposure. The weight

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<sup>2</sup> Many of our groups also signed onto a June 19, 2013, CEO/Executive Director-level letter to President Obama, with the subject line: "Urgent Appeal – neonicotinoid insecticides," available online at: [http://www.centerforfoodsafety.org/files/final-neonic-letter-62013\\_43430.pdf](http://www.centerforfoodsafety.org/files/final-neonic-letter-62013_43430.pdf). Then we said: "Unfortunately, EPA's planned deadline of completing its Registration Reviews for the major neonicotinoids by 2018 is far too slow in view of their potentially calamitous risks". We note 15 months later that the risks appear far more dire than we expressed in 2013. We noted then that the European Union had taken a favorable precautionary action by suspending the use of key neonicotinoids on bee-attractant crops for a minimum of two years, a measure that appears even more justified by the intervening science and facts.

<sup>3</sup> Van der Sluijs JP, et al. 2014. Conclusions of the Worldwide Integrated Assessment on the risks of neonicotinoids and fipronil to biodiversity and ecosystem functioning. *Environ Sci Pollut Res*. doi:10.1007/s11356-014-3229-5.



of the published evidence is very strong that the acute and chronic effects pose a serious risk of harm to colonies/populations of honey bees, bumblebees and other pollinators.<sup>4</sup>

- The most affected group of species include soil invertebrates and insect pollinators, with high exposure through air and plants and medium exposure through water. Invertebrates exposed to contaminated pollen, nectar and fluids are harmed at “field-realistic” concentrations.

The Task Force concluded that current use of the neonicotinoids is not sustainable. Their continued pervasive use will accelerate the global decline of important invertebrates. The diversity and stability of ecosystems worldwide are at risk.

It is particularly noteworthy that the Task Force considered all routes of exposure, whereas EPA’s risk assessment documents for the same insecticides have consistently failed to give full consideration to these routes of exposure: contaminated planting dust; residually contaminated soils; marginal plants that have taken up the neonicotinoid contamination;<sup>5</sup> contaminated guttation fluid; and contaminated surface and groundwater.

Neonicotinoids that are not taken up by the plants during applications can leach or run off directly into soil and water, where residues and metabolites can persist, remaining active for months to years. In one recent U.S. study addressing potato cultivation, they were found to constantly recirculate via pumped groundwater used for irrigating fields – an application and pollution route that EPA did not consider at all when approving the products.<sup>6</sup> Other analyses show pollution of ground and surface waters near treated fields has impacted natural areas that are at considerable distances from application sites, at concentrations high enough to reduce insect populations.<sup>7</sup>

A March 2013 report by the noted Canadian avian toxicologist, Pierre Mineau, together with the American Bird Conservancy (ABC), found groundwater contamination levels that were “totally unprecedented in the history of pesticide registration.”<sup>8</sup> Mineau’s and ABC’s prophetic warnings about the potential for bird declines resulting from this ongoing continent-wide contamination went unheeded by EPA officials.

After the Mineau/ABC report was issued, the multi-year Hallman et al. 2014 study, “Declines in Insectivorous Birds are Associated with High Neonicotinoid Concentrations,” published in prestigious *Nature*, found that commonly-detected levels of imidacloprid in Holland’s surface water is correlated with 3.5% annual decline in bird populations.<sup>9</sup> They assessed other likely

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<sup>4</sup> See also this key new study that post-dated the IUCN Task Force report, Sandrock C, et al. 2014. Impact of chronic neonicotinoid exposure on honeybee colony performance and queen supersedure. *PLoS ONE* 9(8): e103592. doi:10.1371/journal.pone.0103592.

<sup>5</sup> Krupke CH, et al. 2012. Multiple routes of pesticide exposure for honey bees living near agricultural fields. *PLoS ONE*, 7(1): e29268.

<sup>6</sup> Huseeth AS, et al. 2014. Variable concentration of soil-applied insecticides in potato over time: implications for management of *Leptinotarsa decemlineata*. *Pest. Manag. Sci.*. doi: 10.1002/ps.3740.

<sup>7</sup> Mineau P, and C Palmer. 2013. *The Impact of the Nation’s Most Widely Used Insecticides on Birds*. Report by American Bird Conservancy. At: [www.abcbirds.org/abcprograms/policy/toxins/Neonic\\_FINAL.pdf](http://www.abcbirds.org/abcprograms/policy/toxins/Neonic_FINAL.pdf); Main AR, et al. 2014. Widespread use and frequent detection of neonicotinoid insecticides in wetlands of Canada's Prairie Pothole Region. *PLoS One* 9 (3), e92821.

<sup>8</sup> Mineau and Palmer. 2013, *supra*.

<sup>9</sup> Hallmann CA, et al. 2014. Declines in insectivorous birds are associated with high neonicotinoid concentrations. *Nature* doi:10.1038/nature13531.



# Correspondence Management System

Control Number: AX-14-001-5595

Printing Date: September 29, 2014 11:43:42



## Citizen Information

**Citizen/Originator:** Gibbs, Lois Mare

Organization: Center for Health Environment and Justice  
Address: P O Box 6806, Falls Church, VA 22040

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-14-001-5595      **Alternate Number:** N/A  
**Status:** Pending      **Closed Date:** N/A  
**Due Date:** Oct 14, 2014      **# of Extensions:** 0  
**Letter Date:** Sep 25, 2014      **Received Date:** Sep 25, 2014  
**Addressee:** AD-Administrator      **Addressee Org:** EPA  
**Contact Type:** EML (E-Mail)      **Priority Code:** Normal  
**Signature:** DX-Direct Reply      **Signature Date:** N/A  
**File Code:** 404-141-02-01\_141\_b Controlled and Major Corr. Record copy of the offices of Division Directors and other personnel.  
**Subject:** DRF - Daily Reading File - Public health crisis caused by Republic Services' Bridgeton and West Lake landfills in St. Louis; Request for meeting with Gina McCarthy  
**Instructions:** DX-Respond directly to this citizen's questions, statements, or concerns  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** AO-IO-DA-ORO - Office of Regional Operations  
AO-IO-SO - Scheduling Office  
Mark Baldwin - AO-IO  
OEAAE - Office of External Affairs and Environmental Education  
OECA - OECA -- Immediate Office  
OECA-OEJ - Office of Environmental Justice  
OSWER - OSWER -- Immediate Office  
R3 - Region 3 - Immediate Office

## Lead Information

**Lead Author:** N/A

### Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Jacqueline Leavy	OEX	R7	Sep 26, 2014	Oct 14, 2014	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					
Dana Peters	R7	R7-SUPR	Sep 26, 2014	Oct 10, 2014	N/A
<b>Instruction:</b> RA-R7-Prepare draft response for signature by the Regional Administrator for Region 7. Please provide a copy to Dana Peters .					

## Supporting Information



## Center for Health, Environment & Justice

P.O. Box 6806 • Falls Church, VA 22040 • Phone: 703.237.2249 • Fax: 703.237.8389 • [www.chej.org](http://www.chej.org)

September 25, 2014

EPA Administrator Gina McCarthy  
USEPA Headquarters  
c/o Regina McCarthy  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N. W.  
**Mail Code:** 1101A  
Washington, DC 20460

Dear Administrator McCarthy,

It is a pleasure to address you today, although I regret that it has to be under such dire circumstances. As you certainly are familiar with by now, the state of Missouri has experienced more than its fair share of problems in recent months. One of the most pressing of these issues, and the reason why I am writing to you, is the public health crisis caused by Republic Services' Bridgeton and West Lake landfills in St. Louis. My organization, the Center for Health, Environment & Justice (CHEJ) has worked closely with Just Moms STL in addressing this disaster.

A fire has been burning uncontrolled inside the Bridgeton Landfill for over four years and has threatened to spread into the adjacent West Lake Landfill which contains radioactive waste. This nightmare scenario is now a reality, with the fire on the move and nearing the radioactive contaminants. As a result a public meeting was held on Tuesday September 18<sup>th</sup> to discuss what to do in case that the fire reaches the radioactive materials and releases smoke, soot and radioactive materials into the neighborhood. The county's Director of Emergency Management Mark Dietrich told residents, "alerts would go out for residents to shelter in place under a worst case scenario". He added that, "If radioactive ash falls over a widespread area, there could be calls for an evacuation." I believe that it is self-evident that if a Hiroshima-like nuclear disaster occurs in St. Louis, "sheltering in place" will do absolutely nothing to help the residents.

The damage to the public health of the residents in St. Louis is not limited to a potential radioactive threat in the near future – sadly, it has already been done and it has claimed lives. This week, a study was released by the Missouri Department of Health and Senior Services (DHSS) that analyzed cancer incidence data in eight (8) zip codes around the Coldwater Creek

area, including the zip code(s) surrounding the Bridgeton and West Lake Landfills, from 1996-2011. The results of this study are truly scary. The incidence of several types of cancers including leukemia, breast, colon, prostate and kidney cancers to name only a few, was found to be significantly higher in the entire region. In the areas surrounding the landfills, the incidence of brain and other nervous system cancers in children was three times higher than normal. Three times.

Missouri has pleaded with the Agency for Toxics, Disease and Registry (ATSDR) to perform a more extensive study to ascertain the full extent of the damage caused by the landfills. God only knows what other statistically unnatural mortal health conditions they will find within this area. The damage has been done. People and many a children have died. At this point, it's a matter of righting a wrong especially for those who are exposed daily.

It is for this reason, I call on you to personally step in and help CHEJ and Just Moms STL to prevent any more deaths. I respectfully ask for a face-to-face meeting with you to discuss how to safeguard the health of the residents of St. Louis and prevent any more deaths. As your EPA Regional Office has failed to address this in a timely manner, forcing the State Attorney General to step in and demand that they take immediate action, I feel that it is imperative to meet with you personally and discuss the situation and so that together with community leaders we can come up with a solution to this public health crisis.

I look forward to your prompt response, to setting a date in the near future (next 30 days) for our meeting. The fire is moving toward the radioactive wastes, children are dying from brain cancer and "shelter in place" is not a responsible solution to the unknown. There is a need for immediate action.

I can be reached at 703- 942-8214 (direct line) Office 703-237-2249 ext. 130 or through e-mail at [lgibbs@chej.org](mailto:lgibbs@chej.org).

Yours truly,

A handwritten signature in black ink, appearing to read "Lois M. Gibbs". The signature is fluid and cursive, with the first name "Lois" being the most prominent.

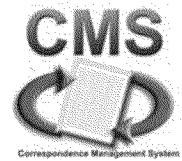
Lois M. Gibbs  
Executive Director  
Center for Health Environment & Justice



# Correspondence Management System

Control Number: AX-14-001-5610

Printing Date: September 29, 2014 11:59:25



## Citizen Information

**Citizen/Originator:** White, Arnette C

Organization: Executive Office of the President, Office of Management Budget  
Address: 725 17th Street, N.W., Washington, DC 20503

**Donovan, Shaun**

Organization: Executive Office of the President, Office of Management and Budget  
Address: 725 17th Street, N.W., Washington, DC 20503

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-14-001-5610      **Alternate Number:** N/A  
**Status:** For Your Information      **Closed Date:** N/A  
**Due Date:** N/A      **# of Extensions:** 0  
**Letter Date:** Sep 25, 2014      **Received Date:** Sep 25, 2014  
**Addressee:** AD-Administrator      **Addressee Org:** EPA  
**Contact Type:** EML (E-Mail)      **Priority Code:** Normal  
**Signature:** SNR-Signature Not Required      **Signature Date:** N/A  
**File Code:** 401\_127\_a General Correspondence Files Record copy  
**Subject:** DRF - Daily Reading File - Apportionment of the Continuing Resolution(s) for Fiscal Year 2015  
**Instructions:** For Your Information -- No action required  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** Ellen Tarquinio - AO-IO  
OEAEE - Office of External Affairs and Environmental Education  
OP - Office of Policy

## Lead Information

**Lead Author:** N/A

**Lead Assignments:**

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
No Record Found.					

## Supporting Information

**Supporting Author:** N/A

**Supporting Assignments:**

Assigner	Office	Assignee	Assigned Date
Jacqueline Leavy	OEX	OCFO	Sep 29, 2014

## History

Action By	Office	Action	Date
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EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D.C. 20503

THE DIRECTOR

September 25, 2014

OMB BULLETIN NO. 14-03

TO THE HEADS OF EXECUTIVE DEPARTMENTS AND ESTABLISHMENTS

SUBJECT: Apportionment of the Continuing Resolution(s) for Fiscal Year 2015

1. Purpose and Background. H.J. Res. 124 will provide continuing appropriations for the period October 1, 2014, through December 11, 2014. As of October 1, 2014, I am automatically apportioning this continuing resolution (CR) as specified in section 3 of this Bulletin for amounts provided by section 101, as well as for amounts for any section that replaces the rate for operations provided by section 101 with a legislative anomaly that specifies an alternate rate for operations ("anomaly"). This Bulletin supplements instructions for apportionment of CRs in OMB Circular No. A-11, sections 120 and 123.

2. Amounts Provided. Section 101(a) of H.J. Res. 124 provides such amounts as may be necessary, at a rate for operations as provided in the applicable appropriations Acts for fiscal year (FY) 2014 and under the authority and conditions provided in such Acts, for continuing projects or activities (including the costs of direct loans and loan guarantees) that are not otherwise specifically provided for in H.J. Res. 124, that were conducted in FY 2014, and for which appropriations, funds, or other authority were made available in Divisions A through L of the Consolidated Appropriations Act, 2014 (Public Law 113-76).

Section 101(b) of H.J. Res. 124 reduces the rate for operations provided by section 101(a) for each account by 0.0554 percent (see Attachment A, item 2 for additional information).

3. Automatic Apportionments. Attachment A contains more detailed instructions on calculating the annualized amount provided by the CR. In order to calculate the amount automatically apportioned through the period ending December 11, 2014, (and any extensions thereof), multiply the annualized amount provided by the CR in section 101 (or in an anomaly) by the percentage of the year (pro-rata) covered by the CR (e.g., for H.J. Res. 124 use 19.73 percent).

Unless determined otherwise by your RMO, all automatically apportioned CR funds are apportioned as Category B (lump sum), regardless of quarterly restrictions (i.e., amounts on Category A) imposed in last year's apportionments. Limitations on programs (i.e., other Category Bs) and footnotes included in last year's apportionments remain in effect under the CR.

During the period of the CR, section 115 applies the 0.0554 percent reduction specified in section 101(b) to FY 2015 discretionary advance appropriations enacted in a prior-year bill that become available on October 1, 2014. This automatic apportionment does not apply to those accounts. Your RMO will apportion those accounts separately.

4. Accounts with Zero Funding Excluded from Automatic Apportionment. As has been the case in recent CR Bulletins, including FY 2014, if either the House or Senate has reported or passed a bill that provides no funding for an account at the time the CR is enacted or extended, this automatic apportionment does not apply to that account. Reported bills are those that have been filed by the full House or Senate Appropriations Committee for floor action. The agency may submit a written apportionment to OMB to request funds for the account during the period of the CR, if needed.

5. Programs under Section 111. Funds for appropriated entitlements and other mandatories and activities under the Food and Nutrition Act of 2008, as defined in item 9 of Attachment A, are automatically apportioned amounts as needed to carry out programs at a rate to maintain program levels under current law, i.e., at the FY 2015 level less any applicable 2015 sequestration pursuant to section 251A of the Balanced Budget and Emergency Deficit Control Act of 1985 (BBEDCA). This automatic apportionment does not, however, apply to programs with more complex funding structures. Agencies should contact their RMO representatives to determine if their account is automatically apportioned or if a written apportionment is required.

With regard to the associated discretionary administrative expenses for those programs, section 111 does not apply. The associated discretionary administrative expenses are automatically apportioned at the pro-rata level based on FY 2014 annualized levels in section 101.

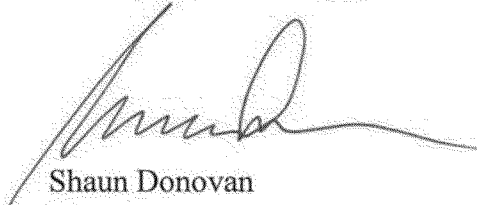
6. Credit Limitations. If there is an enacted credit limitation (i.e., a limitation on loan principal or commitment level) in FY 2014, then the automatic apportionment is the pro-rata share of the credit limitation or the budget authority (i.e., for subsidy cost), whichever is less. To calculate amounts available, see exhibit 123 of OMB Circular No. A-11.

7. Written Apportionments for Amounts Provided by Section 101 and Anomalies. If an agency seeks an amount for an account that is more than the amount automatically apportioned under section 101 or an anomaly, a written apportionment must be requested from OMB. These are referred to as "exception apportionments." Each of these requests must be accompanied by a written justification that includes the legal basis for the exception apportionment (see section 123.7 of OMB Circular No. A-11). OMB expects to grant these written apportionment requests only in extraordinary circumstances.

Conversely, an RMO or an agency may determine that an amount for a program should be less than the amount automatically apportioned to ensure that an agency does not impinge on the final funding prerogatives of the Congress and to encourage prudent financial management and execution of mission. In these cases, a written apportionment will also be required.

Agencies do not need to request a new written apportionment for each extension of the CR (unless otherwise required by your RMO). Instead, in the case of accounts that receive a written apportionment at any time during the CR period, the automatic apportionment will apply to such accounts under any subsequent extensions of the CR, provided that the total amount apportioned during the CR period does not exceed the total annualized level of the CR. However, any footnotes on the written apportionment continue to apply to the accounts, when subsequently operating under the automatic apportionment.

The requirements described in this section are not intended to address the written apportionments for accounts with zero funding. That requirement is described in section 4 above.



Shaun Donovan  
Director

Attachment(s)

Attachment A: Continuing Resolution Frequently Asked Questions

Attachment B: Non-CHIMP Cancellations Recurring in a 2015 Continuing Resolution

Attachment C: Changes in Mandatory Programs Recurring in a 2015 Continuing Resolution





# Correspondence Management System

Control Number: AX-14-001-5612

Printing Date: September 29, 2014 12:10:48



## Citizen Information

**Citizen/Originator:** Colvin, Carolyn W.

Organization: Social Security Administration  
Address: 6401 Security Boulevard, Baltimore, MD 21235-0001

**Ramirez, Adolph**

Organization: Social Security Administration, Office of Executive Operations  
Address: 6401 Security Boulevard, Baltimore, MD 21235

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-14-001-5612      **Alternate Number:** N/A  
**Status:** For Your Information      **Closed Date:** N/A  
**Due Date:** N/A      **# of Extensions:** 0  
**Letter Date:** Sep 25, 2014      **Received Date:** Sep 25, 2014  
**Addressee:** AD-Administrator      **Addressee Org:** EPA  
**Contact Type:** EML (E-Mail)      **Priority Code:** Normal  
**Signature:** SNR-Signature Not Required      **Signature Date:** N/A  
**File Code:** 401\_127\_a General Correspondence Files Record copy  
**Subject:** DRF - Daily Reading File - International Customer Service Association sponsored Customer Service Week from October 6-10, 2014  
**Instructions:** For Your Information -- No action required  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** Mark Baldwin - AO-IO  
OEAE - Office of External Affairs and Environmental Education

## Lead Information

**Lead Author:** N/A

**Lead Assignments:**

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
No Record Found.					

## Supporting Information

**Supporting Author:** N/A

**Supporting Assignments:**

Assigner	Office	Assignee	Assigned Date
Jacqueline Leavy	OEX	OARM	Sep 29, 2014

## History

Action By	Office	Action	Date
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## SOCIAL SECURITY

The Commissioner

September 25, 2014

The Honorable Gina McCarthy  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. McCarthy:

As co-Goal Leader for the Customer Service Cross-Agency Priority (CAP) Goal, it is my honor to recognize the International Customer Service Association sponsored Customer Service Week from October 6-10, 2014. This year's theme is "Say Yes to Excellence."

Each year, the Federal Government serves millions of Americans. From disabled veterans who need assistance, college students who apply for federal aid, those who visit our national parks, and countless others, our customers depend on us to provide outstanding service. Throughout the Nation, our employees provide world-class customer service every day, and they should be commended for their dedication, hard work, and compassion.

This year, we join with the Department of Labor, several state and local government organizations, and other customer-oriented businesses across the country to celebrate the efforts of those who provide exceptional customer service. During Customer Service Week, I encourage you to remind your employees how much you appreciate them and the work they do each day for the American public.

In addition, in the coming weeks, the Customer Service CAP Goal team will begin sharing more information about our strategy for improving customer service across the Federal Government, for example, introducing an award program and a toolkit for promoting inter-agency collaboration. I am excited about the opportunity to lead these efforts and encourage you to stay tuned for more information.

For information about Customer Service Week and ideas for ways to celebrate, please visit [www.csweek.com](http://www.csweek.com). If you have questions, you may also contact Regina B. Smith, Director of our Office of Strategic Planning and Innovation, by email at [Regina.B.Smith@ssa.gov](mailto:Regina.B.Smith@ssa.gov) or by phone at (410) 966-9423.

For those agencies participating in the Customer Service Community of Practice, your coordinator received additional information about Customer Service Week at the September 23, 2014 workgroup meeting.

Sincerely,

A handwritten signature in cursive script, reading "Carolyn W. Colvin".

Carolyn W. Colvin  
Acting Commissioner

cc: Beth Cobert, Deputy Director for Management



# Correspondence Management System

Control Number: AX-14-001-5634

Printing Date: September 29, 2014 11:12:59



## Citizen Information

**Citizen/Originator:** Dyott, Ingrid S

Organization: Neuberger Berman, LLC

Address: 605 Third Avenue, New York, NY 10158-3698

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-14-001-5634

**Alternate Number:** N/A

**Status:** Pending

**Closed Date:** N/A

**Due Date:** Oct 15, 2014

**# of Extensions:** 0

**Letter Date:** Sep 18, 2014

**Received Date:** Sep 26, 2014

**Addressee:** AD-Administrator

**Addressee Org:** EPA

**Contact Type:** LTR (Letter)

**Priority Code:** Normal

**Signature:** DX-Direct Reply

**Signature Date:** N/A

**File Code:** 404-141-02-01\_141\_b Controlled and Major Corr. Record copy of the offices of Division Directors and other personnel.

**Subject:** DRF - Daily Reading File - Methane Standards

**Instructions:** DX-Respond directly to this citizen's questions, statements, or concerns

**Instruction Note:** N/A

**General Notes:** N/A

**CC:** Amy Hambrick - AO-IO

OEAE - Office of External Affairs and Environmental Education

OEI - Office of Environmental Information - Immediate Office

R2 - Region 2 -- Immediate Office

## Lead Information

**Lead Author:** N/A

### Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Jacqueline Leavy	OEX	OAR	Sep 29, 2014	Oct 15, 2014	N/A
<b>Instruction:</b> DX-Respond directly to this citizen's questions, statements, or concerns					

## Supporting Information

**Supporting Author:** N/A

### Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found.			

## History

Action By	Office	Action	Date
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Neuberger Berman  
605 Third Avenue  
New York, NY 10158-3698  
Tel. 212.476.9000

NEUBERGER	BERMAN
-----------	--------

September 18, 2014

The Honorable Gina McCarthy  
Administrator  
Environmental Protection Agency  
William Jefferson Clinton Federal Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

RT  
2014 SEP 26 PM 12:21  
OFFICE OF THE  
EXECUTIVE SECRETARY

Re: EPA Methane Standards

Dear Administrator McCarthy:

Neuberger Berman (the “Manager” or “we”) serves as the investment manager to the Neuberger Berman Socially Responsive Fund (NBSLX) (“Fund”) (\$2.4 billion AUM as of 8/31/2014), has long been a committed shareholder with a deep appreciation for the value of disclosure and the material impact of a company’s environmental, social and governance (“ESG”) performance record. In managing the Fund, we utilize an investment approach that focuses on identifying high quality businesses and integrates that analysis with ESG research. We seek to invest in companies for the Fund that, among other items, implement energy efficiency initiatives and have emissions reduction targets in place.

We have previously informed the EPA of the value that the Toxic Release Inventory (TRI) I data provides in analyzing investments. We are aware that the EPA is now currently moving forward with releasing a set of standards aimed at reducing methane emissions in the oil and gas production process.

We support the EPA releasing a set of thoughtful disclosure requirements and standards that seek to incent cost effective methane emissions reductions from existing and future oil and gas related development and production.

Methane (CH<sub>4</sub>) is the second most prevalent greenhouse gas emitted in the United States from human activities. Natural gas and petroleum systems are the largest source of methane emissions from industry in the United States (EPA Inventory of U.S. GHG Emissions). While we understand that the full life-cycle emissions analysis of natural gas is favorable vs other fuels and can help to lower aggregate emissions while contributing to a cleaner energy mix in the United States, we are aware that methane releases continue to be a challenge and that operating practices vary widely. We believe standardized disclosure and implementing commercially viable

technologies to reduce methane and associated emissions would be beneficial to investors seeking to better understand the risk and opportunities associated with this issue.

We are encouraged by industry experience and numerous examples demonstrating that cost-effective emission controls are available today and create economic and environmental benefits. Increasingly, company executives are also recognizing the benefits of implementing cost effective measures to reduce methane emissions given the opportunity cost of forgone revenue associated with methane that would otherwise be emitted.

Although we commend voluntary efforts by individual companies to reduce methane emissions, many operators continue to lag in this area and disclosure is inconsistent. We believe a national set of guidelines will create clarity for both companies and investors.

The Fund therefore supports the EPA releasing a thoughtful set of disclosure requirements and standards that seek to incent cost effective methane emissions reduction from today's existing and future oil and gas related production.

We appreciate your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Ingrid S. Dyott". The signature is fluid and cursive, with the first name "Ingrid" written in a larger, more prominent script than the last name "Dyott".

Ingrid S. Dyott

Co-Manager Neuberger Berman Socially Responsive Fund



# Correspondence Management System

Control Number: AX-14-001-5636

Printing Date: September 29, 2014 10:50:18



## Citizen Information

**Citizen/Originator:** Elkins, Jr., Arthur A

Organization: U.S. Environmental Protection Agency

Address: 1200 Pennsylvania Avenue, NW, Washington, DC 20460

**Constituent:** N/A

**Committee:** N/A

**Sub-Committee:** N/A

## Control Information

**Control Number:** AX-14-001-5636      **Alternate Number:** N/A  
**Status:** Pending      **Closed Date:** N/A  
**Due Date:** Oct 15, 2014      **# of Extensions:** 0  
**Letter Date:** Sep 25, 2014      **Received Date:** Sep 26, 2014  
**Addressee:** DA-Deputy Administrator      **Addressee Org:** EPA  
**Contact Type:** MEM (Memo)      **Priority Code:** Normal  
**Signature:** DA-Deputy Administrator      **Signature Date:** N/A  
**File Code:** 404-141-02-01\_141\_a(2) Copy of Controlled and Major Correspondence Record of the EPA Administrator and other senior officials - Electronic.  
**Subject:** DRF - Daily Reading File - EPA's Alternative Asbestos Control Method Experiments Lacked Effective Oversight and Threatened Human Health Report No. 14-P-0359  
**Instructions:** DA-Prepare draft response for the Deputy Administrator's signature  
**Instruction Note:** N/A  
**General Notes:** N/A  
**CC:** Amy Hambrick - AO-IO  
OCIR - Office of Congressional and Intergovernmental Relations  
OEAAE - Office of External Affairs and Environmental Education  
OECA - OECA -- Immediate Office  
OGC - Office of General Counsel -- Immediate Office  
ORD - Office of Research and Development -- Immediate Office

## Lead Information

**Lead Author:** N/A

### Lead Assignments:

Assigner	Office	Assignee	Assigned Date	Due Date	Complete Date
Jacqueline Leavy	OEX	OAR	Sep 29, 2014	Oct 15, 2014	N/A
<b>Instruction:</b> DA-Prepare draft response for the Deputy Administrator's signature					

## Supporting Information

**Supporting Author:** N/A

### Supporting Assignments:

Assigner	Office	Assignee	Assigned Date
No Record Found.			



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

## **EPA's Alternative Asbestos Control Method Experiments Lacked Effective Oversight and Threatened Human Health**

Report No. 14-P-0359

September 25, 2014



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## Report Contributors:

Benjamin Beeson  
Martha Chang  
Christine El-Zoghbi  
Eric Lewis  
Jennifer Pallotta  
Wendy Wierzbicki  
Michael Wilson

## Abbreviations

AACM	Alternative Asbestos Control Method
ADP	Action Development Process
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CWA	Clean Water Act
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
NAA	No Action Assurance
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NRML	National Risk Management Research Laboratory
OAQPS	Office of Air Quality Planning and Standards
OAR	Office of Air and Radiation
OECA	Office of Enforcement and Compliance Assurance
OIG	Office of Inspector General
ORD	Office of Research and Development
OSHA	Occupational Safety and Health Administration
RACM	Regulated asbestos-containing material
U.S.C.	U.S. Code

**Cover photo:** An example of the beginning stage of the Alternative Asbestos Control Method process. The photo is from the AACM 3 report. (EPA photo)

**Are you aware of fraud, waste or abuse in an EPA program?**

**EPA Inspector General Hotline**  
1200 Pennsylvania Avenue, NW (2431T)  
Washington, DC 20460  
(888) 546-8740  
(202) 566-2599 (fax)  
[OIG\\_Hotline@epa.gov](mailto:OIG_Hotline@epa.gov)

More information at [www.epa.gov/oig/hotline.html](http://www.epa.gov/oig/hotline.html).

**EPA, Office of Inspector General**  
1200 Pennsylvania Avenue, NW (2410T)  
Washington, DC 20460  
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# At a Glance

## Why We Did This Review

The U.S. Environmental Protection Agency (EPA) Office of Inspector General (OIG) assessed the EPA's oversight of the Alternative Asbestos Control Method (AACM) experiments. This review follows EPA OIG Report No. 12-P-0125, *Early Warning Report: Use of Unapproved Asbestos Demolition Methods May Threaten Public Health*, issued December 14, 2011.

In 1999, the city of Fort Worth, Texas, proposed an alternative method to demolish asbestos-containing buildings. In 2003, the EPA's Office of Research and Development (ORD), National Risk Management Research Laboratory, took over and renamed the effort the AACM. The EPA's Office of Enforcement and Compliance Assurance enabled the experiments by granting enforcement discretion. The ORD terminated the project in 2011 due to technical deficiencies.

**The report addresses the following EPA goal or cross-agency strategy:**

- *Embracing EPA as a high-performing organization.*

Send all inquiries to our public affairs office at (202) 566-2391 or visit [www.epa.gov/oig](http://www.epa.gov/oig).

The full report is at:  
[www.epa.gov/oig/reports/2014/20140925-14-P-0359.pdf](http://www.epa.gov/oig/reports/2014/20140925-14-P-0359.pdf)

## ***EPA's Alternative Asbestos Control Method Experiments Lacked Effective Oversight and Threatened Human Health***

### What We Found

The EPA conducted the AACM and Fort Worth Method research for over a decade without appropriate oversight or an agreed research goal. This resulted in wasted resources and the potential exposure of workers and the public to unsafe levels of asbestos. This occurred because:

- The EPA offices involved did not conduct the research under a controlled and defined agency process that would have ensured consensus and oversight.
- The EPA disregarded research guidance designed to ensure research quality.
- The EPA agreed not to enforce environmental laws during the research when other legal means for conducting the research were available.

Improving oversight of the EPA's research activities can minimize the risk of waste, noncompliance with EPA rules and policies, and project failures.

The EPA spent almost \$2.3 million in contractor costs and expenses from 2004 through 2012, and \$1.2 million in research staff time on AACM experiments from 2005 through 2012. However, these figures only represent a portion of the cost, since the agency does not track contributions from outside organizations or EPA staff time by project. The high dollar cost, potential public health risks, and failure of the AACM to provide reliable data and results are management control problems that need to be addressed.

### Recommendations and Planned Corrective Actions

We recommend that the EPA improve research oversight by requiring significant research to follow a controlled process, tracking project costs and contributions, and reviewing and resolving internal EPA comments. We recommend that the EPA establish a process for the review of alternative regulatory emission control method submissions, and establish and follow standard procedures. We also recommend that the EPA improve controls over issuing No Action Assurance letters. The agency generally provided acceptable corrective actions. Ten of the 11 recommendations we made are resolved and corrective actions are ongoing or completed. One recommendation is unresolved, which the agency will need to address in its final response to the report.

### Noteworthy Achievements

The ORD has adopted a new process to estimate the resources expected to be used on projects, which should provide an initial cost baseline for projects.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

September 25, 2014

**MEMORANDUM**

**SUBJECT:** EPA's Alternative Asbestos Control Method Experiments  
Lacked Effective Oversight and Threatened Human Health  
Report No. 14-P-0359

**FROM:** Arthur A. Elkins Jr.

A handwritten signature in dark ink, appearing to read "Arthur A. Elkins Jr.", written over the printed name.

**TO:** *See Below*

This is our report on the subject review conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

**Action Required**

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 60 calendar days. You should include planned corrective actions and completion dates for all unresolved recommendations. Your response will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at <http://www.epa.gov/oig>.

*Addressees:*

Lisa Feldt, Acting Deputy Administrator  
Cynthia Giles, Assistant Administrator for Enforcement and Compliance Assurance  
Janet McCabe, Acting Assistant Administrator for Air and Radiation  
Lek Kadeli, Acting Assistant Administrator for Research and Development